

EXHIBIT E

1
2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE SOUTHERN DISTRICT OF NEW YORK

4 -----X

5 PAVLE ZIVKOVIC,

6 Plaintiff,

7 v.

8 VALBELLA AT THE PARK, LLC

9 -----X

10 Zoom Video Conference

11 May 4, 2023

12 10:06 a.m.

13 EXAMINATION BEFORE TRIAL of DAVID GHATANFARD, the
14 Defendant in the above-entitled action, held via Zoom Video
15 Conference taken before ELIZABETH SANTOS, a Notary Public of
16 the State of New York, pursuant to order and stipulations
17 between Counsel.

<p style="text-align: right;">Page 2</p> <p>1</p> <p>2 A P P E A R A N C E S:</p> <p>3 HAROLDSALANT STRASSFIELD & SPIELBERG</p> <p>4 Attorney for David Ghatanfard</p> <p>5 81 Main Street</p> <p>6 White Plains, New York 10601</p> <p>7 BY: NEAL S. COMER, ESQ.</p> <p>8</p> <p>9 LAW OFFICES OF FRED SEEMAN</p> <p>10 Attorneys for Robert Daleo</p> <p>11 32 Broadway, Suite 1214</p> <p>12 New York, New York 10004</p> <p>13 BY: FRED SEEMAN, ESQ.</p> <p>14</p> <p>15 JOSEPH & KIRSCHENBAUM, LLP</p> <p>16 Attorneys for Plaintiff</p> <p>17 32 Broadway, Suite 601</p> <p>18 New York, New York 10004</p> <p>19 BY: JOSEF NUSSBAUM, ESQ.</p> <p>20 Also present:</p> <p>21 Lucas Buzzard (Sitting in with Mr. Nussbaum)</p> <p>22 Leonard Spielberg (Sitting in with Mr. Comer)</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 4</p> <p>1 DAVID GHATANFARD</p> <p>2 D A V I D G H A T A N F A R D,</p> <p>3 having first been duly sworn by Elizabeth Santos, a Notary</p> <p>4 Public of the State of New York, was examined and testified</p> <p>5 as follows:</p> <p>6 EXAMINATION BY</p> <p>7 MR. NUSSBAUM:</p> <p>8 COURT REPORTER: Please state your name</p> <p>9 for the record.</p> <p>10 THE WITNESS: David Ghatanfard.</p> <p>11 COURT REPORTER: What is your present</p> <p>12 address?</p> <p>13 THE WITNESS: 56 Oak Grove Road, private</p> <p>14 house, South Hampton, New York.</p> <p>15 Q. Good morning, Ghatanfard.</p> <p>16 A. Good morning.</p> <p>17 Q. I've taken your deposition before, so I</p> <p>18 know you have some experience with this. I'm not</p> <p>19 going to go over the details of all the rules since</p> <p>20 I know you're familiar with them. We're taking your</p> <p>21 deposition today as part of a lawsuit that was</p> <p>22 brought by Pavle Zivkovic against Valbella at the</p> <p>23 Park, LLC.</p> <p>24 Do you understand that?</p> <p>25 A. Yes, I do.</p>
<p style="text-align: right;">Page 3</p> <p>1</p> <p>2 S T I P U L A T I O N S</p> <p>3</p> <p>4</p> <p>5 IT IS HEREBY STIPULATED AND AGREED BY AND BETWEEN the</p> <p>6 parties hereto through their respective counsel that all</p> <p>7 objections as to the form of the question shall be reserved</p> <p>8 to the time of trial;</p> <p>9</p> <p>10 IT IS FURTHER STIPULATED BY AND BETWEEN the parties hereto</p> <p>11 through their respective counsel that sealing, certification</p> <p>12 and filing shall be and the same are hereby waived;</p> <p>13</p> <p>14 IT IS FURTHER STIPULATED AND AGREED that the within</p> <p>15 examination may be signed and sworn to before any Notary</p> <p>16 Public with the same force and effect as if signed and sworn</p> <p>17 to before this Court.</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 5</p> <p>1 DAVID GHATANFARD</p> <p>2 Q. We're also taking your deposition today as</p> <p>3 part of an earlier lawsuit that Mr. Zivkovic brought</p> <p>4 against yourself personally and against Laura Kristy</p> <p>5 Midtown, LLC.</p> <p>6 Do you understand that?</p> <p>7 A. Yes, I do.</p> <p>8 Q. Do you understand that you're going to be</p> <p>9 testifying today on behalf of yourself and on behalf</p> <p>10 of Laura Kristy Midtown, LLC?</p> <p>11 A. Yes, I do.</p> <p>12 Q. I'm going to be asking you a number of</p> <p>13 questions today. The court reporter who you saw</p> <p>14 earlier is going to be writing down everything that</p> <p>15 you say. So it's important that you give clear,</p> <p>16 audible, verbal answers to my questions.</p> <p>17 Do you understand that?</p> <p>18 A. Yes, I do.</p> <p>19 Q. The court reporter has sworn you in and</p> <p>20 you're answering all questions under oath. Do you</p> <p>21 understand that you have the same obligation to tell</p> <p>22 the truth, and would be subject to the same</p> <p>23 penalties for perjury if you don't tell the truth as</p> <p>24 if you were testifying in the Court of Law?</p> <p>25 A. Yes, I do.</p>

<p style="text-align: right;">Page 90</p> <p>1 DAVID GHATANFARD</p> <p>2 Q. Did you recommend it to anyone to</p> <p>3 represent Valbella at the Park?</p> <p>4 A. I don't remember.</p> <p>5 Q. So it's just a coincident that you hired</p> <p>6 him to represent you at Valbella Midtown, but you</p> <p>7 don't have any idea how he was hired to represent</p> <p>8 Valbella at the Park; is that your testimony?</p> <p>9 What's your answer?</p> <p>10 MR.COMER: You cannot characterize his</p> <p>11 answers. He's answered those questions. You</p> <p>12 cannot put your own words into his mouth and</p> <p>13 try to make him --</p> <p>14 Q. Do you have any idea how Mr. Seeman came</p> <p>15 to represent Valbella at the Park?</p> <p>16 A. I answered that question.</p> <p>17 Q. Did you play any role in it?</p> <p>18 A. I answered that question.</p> <p>19 Q. No you didn't. I'm asking, did you play</p> <p>20 any role in Mr. Seeman representing Valbella at the</p> <p>21 Park?</p> <p>22 A. You are changing the wording. I answered</p> <p>23 that question.</p> <p>24 Q. I'm asking you a different question, and</p> <p>25 you have to answer it.</p>	<p style="text-align: right;">Page 92</p> <p>1 DAVID GHATANFARD</p> <p>2 these documents in the lawsuit against Valbella at</p> <p>3 the Park.</p> <p>4 I'd like to direct your attention to</p> <p>5 page 3, 299 of the PDF, which is bate stamped</p> <p>6 DEF293. On the top of this page it says, Limited</p> <p>7 Liability Company agreement of Oak Grove Road, LLC.</p> <p>8 Do you see that?</p> <p>9 MR. SPIELBERG: Josef, Fred, asked me to</p> <p>10 call him if something that came up that could</p> <p>11 involve him. I think I need to call him.</p> <p>12 MR. NUSSBAUM: For the record, we need the</p> <p>13 witness for seven hours, so we're not giving up</p> <p>14 our time for counsel to make phone calls on the</p> <p>15 record, after taking a 45-minute lunch break.</p> <p>16 We're not going to let this cut into our time</p> <p>17 so you can go ahead.</p> <p>18 MR. NUSSBAUM: I'd just like to state for</p> <p>19 the record that we started 15 or 20 minutes</p> <p>20 late today, and we just took an hour lunch</p> <p>21 break, so we're reserving our time.</p> <p>22 Q. Mr. Ghatanfard, I'm showing you a document</p> <p>23 that I told you a moment ago I'm marking as</p> <p>24 Plaintiff's Exhibit 3. And I'm turning your</p> <p>25 attention to the page that's marked as DEF293.</p>
<p style="text-align: right;">Page 91</p> <p>1 DAVID GHATANFARD</p> <p>2 Did you have any part of the decision</p> <p>3 to hire Mr. Seeman to represent Valbella at the</p> <p>4 Park?</p> <p>5 A. And I told you, I had nothing to do with</p> <p>6 it.</p> <p>7 MR. NUSSBAUM: I think now is a good time</p> <p>8 to break for lunch.</p> <p>9 (Recess taken)</p> <p>10 MR. NUSSBAUM: We're back on the record.</p> <p>11 Q. Mr. Ghatanfard, you're still under oath.</p> <p>12 Do you understand that?</p> <p>13 We can't hear you. You have to sit</p> <p>14 closer and speak louder?</p> <p>15 A. Yes, I do.</p> <p>16 Q. Mr. Ghatanfard, I'd like to show you a</p> <p>17 document that I'm going to mark as Plaintiff's</p> <p>18 Exhibit 3, 471 page document.</p> <p>19 (The document was hereby deemed marked as</p> <p>20 Plaintiff's Exhibit 3 for identification, as of</p> <p>21 this date.)</p> <p>22 Q. This 471-page document on the first page</p> <p>23 in bold it says, Defendant's Response to Plaintiffs</p> <p>24 first request for the Production of Documents. I'm</p> <p>25 going to represent the Mr. Seeman provided us with</p>	<p style="text-align: right;">Page 93</p> <p>1 DAVID GHATANFARD</p> <p>2 MR.COMER: Make it larger, Josef, it came</p> <p>3 in very small.</p> <p>4 MR. NUSSBAUM: For the record, this is</p> <p>5 larger than the other documents that the</p> <p>6 witness was able to read earlier in this</p> <p>7 deposition.</p> <p>8 MR.COMER: I expanded it.</p> <p>9 Q. Do you say where it says Limited Liability</p> <p>10 Company Agreement of Oak Grove Road, LLC?</p> <p>11 A. Yes.</p> <p>12 Q. Are you familiar with this document?</p> <p>13 A. I'm sorry.</p> <p>14 Q. Are you familiar with this document?</p> <p>15 A. No.</p> <p>16 Q. I'd like to turn your attention to the end</p> <p>17 of this agreement marked DEF302. And it says on the</p> <p>18 top, This LLC Operating Agreement is executed and</p> <p>19 agreed to by David Ghatanfard.</p> <p>20 Do you see that?</p> <p>21 A. I see it.</p> <p>22 Q. Do you recall signing an operating</p> <p>23 agreement for Oak Grove Road LLC?</p> <p>24 It's an electronic signature; right?</p> <p>25 A. No. I don't know.</p>

<p style="text-align: right;">Page 94</p> <p>1 DAVID GHATANFARD</p> <p>2 Q. Do you recall ever signing or agree to an</p> <p>3 operating agreement for Oak Grove Road, LLC?</p> <p>4 A. No.</p> <p>5 Q. Do you know why if there are any</p> <p>6 amendments to an agreement to the Oak Grove Road,</p> <p>7 LLC?</p> <p>8 MR. SEEMAN: Objection.</p> <p>9 Q. What was the answer?</p> <p>10 A. No.</p> <p>11 Q. Who would know if there were any operating</p> <p>12 agreements for Oak Grove Road, LLC?</p> <p>13 A. I don't know.</p> <p>14 Q. Well, who owns Oak Grove Road, LLC, you</p> <p>15 do; right?</p> <p>16 MR. SEEMAN: Objection.</p> <p>17 Q. You own Oak Grove Road, LLC; correct?</p> <p>18 MR. SEEMAN: Objection.</p> <p>19 A. I don't know anything about it. I don't</p> <p>20 know.</p> <p>21 Q. You don't know anything about any</p> <p>22 operating agreements or anything about amendments</p> <p>23 for to any operating agreements to Oak Grove Road,</p> <p>24 LLC?</p> <p>25 A. I don't know.</p>	<p style="text-align: right;">Page 96</p> <p>1 DAVID GHATANFARD</p> <p>2 A. I'm sorry.</p> <p>3 Q. Was it more or less than a million</p> <p>4 dollars?</p> <p>5 A. I didn't invest any money.</p> <p>6 Q. So how did you become a partner?</p> <p>7 A. I believe the reason of, you know, being,</p> <p>8 you know, management a part of -- what you call it,</p> <p>9 deeds, I have ten percent. Five or 10 percent of</p> <p>10 the deed.</p> <p>11 Q. I'd like to direct your attention to page</p> <p>12 310 of this exhibit, which is marked as DEF304.</p> <p>13 On the top it says, First Amendment</p> <p>14 to the Operating Agreement of Oak Grove Road, LLC.</p> <p>15 Do you see that?</p> <p>16 A. I do.</p> <p>17 Q. And then on the next page at the bottom or</p> <p>18 two pages later, I'm sorry, at the bottom it says,</p> <p>19 Acknowledged and Agreed, David Ghatanfard and</p> <p>20 there's a signature.</p> <p>21 Is that your signature?</p> <p>22 A. No.</p> <p>23 Q. That's not your signature?</p> <p>24 A. No.</p> <p>25 Q. Who signed the checks at Valbella Midtown,</p>
<p style="text-align: right;">Page 95</p> <p>1 DAVID GHATANFARD</p> <p>2 Q. Did you ever meet with any attorneys to</p> <p>3 sign an agreement or to organize an agreement for</p> <p>4 Oak Grove Road, LLC?</p> <p>5 A. No.</p> <p>6 Q. Isn't it true that Oak Grove Road, LLC is</p> <p>7 the company that you used to invest in Valbella at</p> <p>8 the Park?</p> <p>9 A. I don't know.</p> <p>10 Q. How did you become a partner at Valbella</p> <p>11 at the Park?</p> <p>12 A. I didn't handle that part.</p> <p>13 Q. So you don't know how you became a partner</p> <p>14 at Valbella at the Park?</p> <p>15 A. I just know that I'm 10 percent partner in</p> <p>16 Valbella at the Park.</p> <p>17 Q. But you don't know how that came to be?</p> <p>18 A. No.</p> <p>19 Q. I'd like to direct your attention to an</p> <p>20 earlier part of this exhibit -- withdrawn.</p> <p>21 How much did you invest in Valbella</p> <p>22 at the Park?</p> <p>23 A. I don't recall.</p> <p>24 Q. Was it more or less than a million</p> <p>25 dollars?</p>	<p style="text-align: right;">Page 97</p> <p>1 DAVID GHATANFARD</p> <p>2 you did; right?</p> <p>3 A. At Valbella Midtown?</p> <p>4 Q. Yes.</p> <p>5 A. Sometimes.</p> <p>6 Q. Who else signed the checks?</p> <p>7 A. I believe it was Laura Demarco.</p> <p>8 Q. The signature next to your signature on</p> <p>9 page DEF306, is that Rosey's signature?</p> <p>10 A. I don't know.</p> <p>11 Q. You don't know what her signature looks</p> <p>12 like?</p> <p>13 A. No.</p> <p>14 Q. To be clear, your testimony is that this</p> <p>15 is 100 percent not your signature?</p> <p>16 A. No.</p> <p>17 Q. Pardon me.</p> <p>18 A. I don't think -- that's not my signature.</p> <p>19 Q. You would recognize your signature; right?</p> <p>20 A. I do.</p> <p>21 Q. Turning to the next page, DEF307, there's</p> <p>22 a document entitled Assignment and Assumption of</p> <p>23 Membership Interest.</p> <p>24 Do you see that?</p> <p>25 A. Yes, I do.</p>

25 (Pages 94 - 97)

<p style="text-align: right;">Page 98</p> <p>1 DAVID GHATANFARD</p> <p>2 Q. On the next page after that, the bottom of</p> <p>3 document, it says assignor and then David Ghatanfard</p> <p>4 and there's a signature.</p> <p>5 Do you see that?</p> <p>6 A. I do.</p> <p>7 Q. Is that your signature?</p> <p>8 I can't hear you, Neal.</p> <p>9 MR.COMER: I said at the bottom there are</p> <p>10 two David Ghatanfard purported signatures.</p> <p>11 Are you asking about both or one?</p> <p>12 MR. NUSSBAUM: Great question.</p> <p>13 Q. The first one Mr. Ghatanfard, is that your</p> <p>14 signature?</p> <p>15 A. I really don't know. I don't see it.</p> <p>16 Q. What about the second one, where it says</p> <p>17 David Ghatanfard, member.</p> <p>18 Is that your signature?</p> <p>19 A. I don't know.</p> <p>20 Q. I'm sorry.</p> <p>21 A. No.</p> <p>22 Q. How about assignee, Rosey Kalayjian, is</p> <p>23 that Rosey's signature?</p> <p>24 A. I don't know.</p> <p>25 Q. Again, these documents were produced to me</p>	<p style="text-align: right;">Page 100</p> <p>1 DAVID GHATANFARD</p> <p>2 Road, LLC?</p> <p>3 A. I don't know.</p> <p>4 Q. Have you ever heard of the company Oak</p> <p>5 Grove Road, LLC?</p> <p>6 A. I heard it today.</p> <p>7 Q. Before today, did you ever hear of the</p> <p>8 company?</p> <p>9 A. I don't recall.</p> <p>10 Q. I'd like to turn your attention to an</p> <p>11 earlier part of the same Exhibit 3, page DEF013,</p> <p>12 it's page 19 of the PDF at the top where it says,</p> <p>13 Operating Agreement for Valbella at the Park.</p> <p>14 Do you see that?</p> <p>15 A. Yes.</p> <p>16 Q. Have you seen this document before?</p> <p>17 A. I don't recall.</p> <p>18 Q. Do you know if there is an operating</p> <p>19 agreement for Valbella at the Park?</p> <p>20 A. I don't recall.</p> <p>21 Q. I'd like to show you page 15 of the</p> <p>22 agreement which is DEF027, where it says Oak Grove</p> <p>23 Road, LLC and then by David Ghatanfard and then</p> <p>24 there's a signature.</p> <p>25 Is that your signature?</p>
<p style="text-align: right;">Page 99</p> <p>1 DAVID GHATANFARD</p> <p>2 to my office by Fred Seeman, who is the attorney for</p> <p>3 Valbella at the Park, which you're a partner in.</p> <p>4 Do you have any idea why Mr. Seeman</p> <p>5 would of produced these documents if it doesn't have</p> <p>6 your signature on it?</p> <p>7 MR. SPIELBERG: Objection.</p> <p>8 Q. You can answer.</p> <p>9 A. I don't know.</p> <p>10 Q. So just so I understand your testimony,</p> <p>11 your testimony is that never owned Oak Grove Road,</p> <p>12 LLC?</p> <p>13 A. Sorry.</p> <p>14 Q. Your testimony is that you never owned Oak</p> <p>15 Grove Road, LLC?</p> <p>16 A. I don't know.</p> <p>17 Q. Who would know?</p> <p>18 A. I don't know.</p> <p>19 Q. I'm sorry, what was the answer?</p> <p>20 MR. NUSSBAUM: Neal, we're in the middle</p> <p>21 of a deposition and we can hear you.</p> <p>22 Q. Mr. Ghatanfard, who would know the answer</p> <p>23 to that?</p> <p>24 A. I do not know.</p> <p>25 Q. And you were never a member of Oak Grove</p>	<p style="text-align: right;">Page 101</p> <p>1 DAVID GHATANFARD</p> <p>2 A. I really don't know.</p> <p>3 Q. You don't know if it's your signature?</p> <p>4 A. I'm not sure. I'm really not sure.</p> <p>5 Q. Are you familiar with any operating</p> <p>6 agreements for Valbella at the Park?</p> <p>7 A. I don't remember.</p> <p>8 Q. Are you familiar with any amendments to</p> <p>9 any operating agreements for Valbella at the Park?</p> <p>10 A. I don't remember.</p> <p>11 Q. Do you recall signing any documents</p> <p>12 relating to the formation of Valbella at the Park?</p> <p>13 A. I don't recall.</p> <p>14 Q. Sir, in 2021, 2022, you're a partner in</p> <p>15 the new restaurant; right?</p> <p>16 A. I'm sorry.</p> <p>17 Q. In the year 2021 and 2022 you become a</p> <p>18 partner in a new restaurant; right?</p> <p>19 A. I was a small shareholder of the new</p> <p>20 restaurant.</p> <p>21 Q. Do you remember signing any documents</p> <p>22 connected to becoming a shareholder in the</p> <p>23 restaurant?</p> <p>24 A. I really don't remember.</p> <p>25 Q. So it's possible that you did; right?</p>

<p style="text-align: right;">Page 238</p> <p>1 DAVID GHATANFARD</p> <p>2 A. I don't remember.</p> <p>3 Q. Why is it that you did not fully answer</p> <p>4 this question?</p> <p>5 A. I don't know.</p> <p>6 Q. What steps did you take to try to answer</p> <p>7 this question?</p> <p>8 A. I don't know.</p> <p>9 Q. So when you said in this document, again</p> <p>10 under the penalty of perjury, that the contents in</p> <p>11 this document are true, it's not true that you</p> <p>12 listed every transfer or every transfer you made</p> <p>13 that was more than \$1,000.00; correct?</p> <p>14 MR.COMER: Do not answer.</p> <p>15 MR. NUSSBAUM: Are you going to seek a</p> <p>16 protective order, Mr. Comer?</p> <p>17 I can't hear you.</p> <p>18 MR.COMER: I told him not to answer that</p> <p>19 question.</p> <p>20 MR. NUSSBAUM: What's the basis for your</p> <p>21 direction to not answer?</p> <p>22 MR.COMER: I don't owe you any.</p> <p>23 MR. NUSSBAUM: Yes, you do. You're an</p> <p>24 officer of the court at a deposition, and</p> <p>25 either you're going to seek a protective order,</p>	<p style="text-align: right;">Page 240</p> <p>1 DAVID GHATANFARD</p> <p>2 A. Yes.</p> <p>3 Q. I asked you earlier if you invested any</p> <p>4 money in Valbella at the Park, and you said no.</p> <p>5 I also want to ask you, did you</p> <p>6 invest any money in Oak Grove Road, LLC?</p> <p>7 A. I really don't know.</p> <p>8 Q. As far as you know, you did not invest any</p> <p>9 money in Oak Grove Road, LLC?</p> <p>10 A. I didn't say that. I don't know.</p> <p>11 Q. What would help you remember if you did or</p> <p>12 did not?</p> <p>13 MR. SEEMAN: Objection.</p> <p>14 A. I don't know.</p> <p>15 Q. To be clear, you don't know where the \$3.5</p> <p>16 million went, and you don't know if you invested</p> <p>17 anything in Oak Grove Road, LLC.</p> <p>18 Is that your testimony?</p> <p>19 MR. SEEMAN: Objection.</p> <p>20 A. I didn't say that. I said, I don't know</p> <p>21 where all the money went. I know a lot of the money</p> <p>22 went to, you know, my expenses. Whatever I did, my</p> <p>23 expenses. I said that I help my, you know, brother</p> <p>24 back home. I paid my taxes. And, you know, I --</p> <p>25 that's all I did.</p>
<p style="text-align: right;">Page 239</p> <p>1 DAVID GHATANFARD</p> <p>2 or the witness can plead the fifth amendment,</p> <p>3 or he has to answer. Those are the options at</p> <p>4 a deposition.</p> <p>5 I can't hear you.</p> <p>6 MR.COMER: Okay, thank you for the</p> <p>7 lecture. He's not answering that question.</p> <p>8 Q. So your answer to 16 is not a true answer;</p> <p>9 correct?</p> <p>10 MR.COMER: He's not going to answer.</p> <p>11 MR. SEEMAN: Objection.</p> <p>12 MR. NUSSBAUM: I'd like to mark the last</p> <p>13 two directions to not answer for a ruling by</p> <p>14 the court.</p> <p>15 We're marking for a ruling and we're</p> <p>16 noting for the record, that Mr. Comer is</p> <p>17 refusing to state the basis for his instruction</p> <p>18 to the witness to not answer the question.</p> <p>19 MR.COMER: Mr. Nussbaum, Mr. Ghatanfard</p> <p>20 needs a five-minute break.</p> <p>21 (Recess taken)</p> <p>22 MR. NUSSBAUM: Back on the record.</p> <p>23 Q. Mr. Ghatanfard, just to remind that you're</p> <p>24 still under oath.</p> <p>25 Do you understand that?</p>	<p style="text-align: right;">Page 241</p> <p>1 DAVID GHATANFARD</p> <p>2 Q. What expenses did you pay with the money?</p> <p>3 A. I don't remember.</p> <p>4 Q. You know you paid expenses, but you don't</p> <p>5 remember any expenses?</p> <p>6 MR. SEEMAN: Objection.</p> <p>7 A. I paid the legal fee, that I paid them.</p> <p>8 And, you know, I, you know, I paid taxes.</p> <p>9 Q. Three and a half million dollars went to</p> <p>10 legal fees and taxes?</p> <p>11 A. And, you know --</p> <p>12 MR. SEEMAN: Objection.</p> <p>13 Q. And what else?</p> <p>14 Mr. Ghatanfard, what else?</p> <p>15 MR. SEEMAN: No question pending.</p> <p>16 Objection.</p> <p>17 Q. Mr. Ghatanfard, what else did it go to?</p> <p>18 MR. SEEMAN: Objection.</p> <p>19 A. Taxes.</p> <p>20 Q. You said that already?</p> <p>21 A. Expenses.</p> <p>22 Q. Did you give any of it to Rosey Kalayjian?</p> <p>23 A. What, did I?</p> <p>24 Q. Did you give any of it, the money to Rosey</p> <p>25 Kalayjian?</p>